MEMORANDUM TO FILE

To: Bart Canellas, EPA Site Assessment Manager

From: Daniel S. Johnson, Roy F. Weston, Inc.

Through: Robert B. Beck, P.E., Roy F. Weston, Inc.

Date: 3 June 1997

Regarding: Richmond Tank Car Company, EPA ID No.: TXD086467800
Summary of File Information

Document Control No.: 02/06 - C-S021

Site Description/History: According to the Final Strategy Determination, dated 10 October 1984, the Richmond Tank Car Company site is an active washing and maintenance facility for railroad tank cars. The site, located on Old Clute Road in Angleton, Brazoria County, Texas, consists of a 9-acre active plant area, including 5 buildings, a drum storage area, and a 2-acre surface impoundment. Waste generated onsite includes washwater and float material (oil and polyethylene pellets). The date operations began could not be determined from the files reviewed. Plant superintendent, Tony Rodriguez (409) 849-8554, was interviewed during the 10 May 1984 Site Inspection (SI) Report.

Prior to 1972, the washwater/wastewater was discharged directly into the City of Angleton's drainage ditch, which leads to Bastrop Bayou. In 1972, a permit was issued for discharging of the wastewater into the Angleton Sewage Treatment Plant at a rate of 20,000 gallons per day. In 1976, the 2-acre waste pond was reportedly reconstructed to control groundwater contamination and to prevent overtopping after heavy rains.

In 1983, the Texas Department of Water Resources (TDWR) reported violations of disposal of the Class I float material in the Brazoria County Class II Landfill in Clute, Texas. The TDWR indicated that this waste should be disposed of at an authorized Class I site. Since then, the float material has been temporarily stored onsite in a drum storage area before solidifying with sand and gravel. The consolidating operation is conducted in a low area on the site.

Groundwater contamination has occurred in the past, but quarterly 1983 monitoring well data showed continuous improvement in the groundwater quality. As of the 1984 SI, no measures had been taken to prevent surface water runoff.

Potential Waste Sources: The onsite buildings serve as an office, a repair shop, a storage shed, a paint and lining building, and a boiler building. The status of the drum storage area and the number of drums onsite is unknown. The onsite surface impoundment is an irregular shaped earthen pond, lined with clay. The SI report indicated the the pond embankments were in a stable condition with 1 to 3 feet freeboard. Additionally, 2 five-horsepower surface aerators were used in the pond for odor control. The waste pond was reconstructed in 1976 due to groundwater contamination from the seepage of wastewater. Since then, no illegal discharge of overflow has been reported. Washwater from steam washing operations is diverted to the below-grade oil/water separator, and then pumped to the waste pond for stabilization. A contract was under negotitaion in 1984 for disposal of the float material by Texas Ecologist, Inc. at their Corpus Christi, Texas landfill site.

Analytical Data: One surface water and two groundwater samples were collected during the 1984 Site Inspection. The Total Chlorinated Organic (TOX) concentrations were 200 µg/l, 140 µg/l, and 60µg/l for the surface impoundment, Well Number 1, and Well Number 2, respectively. This indicates that chlorinated organics exist in the wastewater and groundwater at low concentrations. Values of TOC and COD are within the reported ranges for background data.

Targets: According to the 1984 SI report, approximately 13,000 people are in residential areas within 1 to 2 miles of the site, 700 are in commercial or industrial areas within 2 to 3 miles, 15,800 are in publicly travelled areas within less than 0.25 mile, and 650 are in public use areas, (such as parks, schools, etc) within 1 mile.

Although the SI report indicates the source of Angleton's drinking water supply as surface water, the distance and location to this surface water is unknown. The receiving waters for surface runoff from the site are listed as Bastrop Bayou and the San Jacinto River. Furthermore, the San Jacinto River is classified as suitable for noncontact recreation and propagation of fish and wildlife.

The regional geologic units containing fresh to slightly saline water in Brazoria County are the Goliad Sand, Willis Sand, Bentley Formation, Montgomery Formation, Beaumont Clay, and the Quaternary alluvium. The chief aquifers in the region are the Chicot and Evangeline aquifers which have a thickness of 500 to 900 feet and 1100 to 1500 feet, respectively. Recharge to the Chicot aquifer occurs through direct infiltration of precipitation in the outcrop area. Locally, groundwater occurs at a depth of 40 to 50 feet. No drinking water wells were reported within a 0.25 mile radius of the site.